

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

Lavell Redmond
_____,

Plaintiff(s),

vs.

Tiffany A. Henyard
Village of Dolton
(IN HER OFFICIAL CAPACITY AS)
MAYOR
Defendant(s).

RECEIVED

AUG 11 2023 *um*

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

Case No.

1:23-cv-05360
Judge Mary M. Rowland
Magistrate Judge Sheila M. Finnegan
RANDOM

COMPLAINT FOR VIOLATION OF CONSTITUTIONAL RIGHTS

This form complaint is designed to help you, as a pro se plaintiff, state your case in a clear manner. Please read the directions and the numbered paragraphs carefully. Some paragraphs may not apply to you. You may cross out paragraphs that do not apply to you. All references to "plaintiff" and "defendant" are stated in the singular but will apply to more than one plaintiff or defendant if that is the nature of the case.

1. This is a claim for violation of plaintiff's civil rights as protected by the Constitution and laws of the United States under 42 U.S.C. §§ 1983, 1985, and 1986.
2. The court has jurisdiction under 28 U.S.C. §§ 1343 and 1367.
3. Plaintiff's full name is Lavell Redmond.

If there are additional plaintiffs, fill in the above information as to the first-named plaintiff and complete the information for each additional plaintiff on an extra sheet.

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

4. Defendant, Tiffany A. Menyard, is
(name, badge number if known)
- ☒ an officer or official employed by Village of Dolton;
(department or agency of government)
- _____ or
- ☐ an individual not employed by a governmental entity.

If there are additional defendants, fill in the above information as to the first-named defendant and complete the information for each additional defendant on an extra sheet.

5. The municipality, township or county under whose authority defendant officer or official acted is Village of Dolton. As to plaintiff's federal constitutional claims, the municipality, township or county is a defendant only if custom or policy allegations are made at paragraph 7 below.

6. On or about 8/3/2022, at approximately 12:30 ☐ a.m. ☒ p.m.
(month, day, year)

plaintiff was present in the municipality (or unincorporated area) of _____
Village of Dolton, in the County of Cook,

State of Illinois, at 14122 Dr. Martin Luther King Drive,
(identify location as precisely as possible) Dolton, IL, 60419 (City Hall)

when defendant violated plaintiff's civil rights as follows (*Place X in each box that applies*):

- ☐ arrested or seized plaintiff without probable cause to believe that plaintiff had committed, was committing or was about to commit a crime;
- ☐ searched plaintiff or his property without a warrant and without reasonable cause;
- ☐ used excessive force upon plaintiff;
- ☐ failed to intervene to protect plaintiff from violation of plaintiff's civil rights by one or more other defendants;
- ☐ failed to provide plaintiff with needed medical care;
- ☐ conspired together to violate one or more of plaintiff's civil rights;

☒ Other: First Amendment of the Constitution
Freedom of Speech.

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

7. Defendant officer or official acted pursuant to a custom or policy of defendant municipality, county or township, which custom or policy is the following: (*Leave blank if no custom or policy is alleged*): N/A

8. Plaintiff was charged with one or more crimes, specifically:

N/A

9. (*Place an X in the box that applies. If none applies, you may describe the criminal proceedings under "Other"*) The criminal proceedings

- ☐ are still pending. N/A
- ☐ were terminated in favor of plaintiff in a manner indicating plaintiff was innocent.¹
- ☐ Plaintiff was found guilty of one or more charges because defendant deprived me of a fair trial as follows _____
- ☐ Other: _____

¹Examples of termination in favor of the plaintiff in a manner indicating plaintiff was innocent may include a judgment of not guilty, reversal of a conviction on direct appeal, expungement of the conviction, a voluntary dismissal (SOL) by the prosecutor, or a *nolle prosequi* order.

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

10. Plaintiff further alleges as follows: *(Describe what happened that you believe supports your claims. To the extent possible, be specific as to your own actions and the actions of each defendant.)*

(SEE ATTACHED)

11. Defendant acted knowingly, intentionally, willfully and maliciously.
12. As a result of defendant's conduct, plaintiff was injured as follows:

(SEE ATTACHED)

13. Plaintiff asks that the case be tried by a jury. ☐ Yes ☒ No

(ANSWER TO ITEM 10)

(IN HER OFFICIAL
CAPACITY AS MAYOR
OF THE VILLAGE OF DOLTON)

IN OR AROUND MID SUMMER OF 2020, I WAS BROUGHT OUT FROM CHICAGO TO DOLTON, ILLINOIS BY A FRIEND WHO PROMISED ME AN OPPORTUNITY THAT WOULD POSSIBLY ENSURE A STEADY JOB; I WAS RELUCTANT YET I STILL DECIDED TO GIVE IT A CHANCE BEING PREVIOUSLY INCARCERATED AND JOBLESS. UPON MY ARRIVAL TO DOLTON, ILLINOIS I WAS INTRODUCED TO A YOUNG CANDIDATE FOR MAYOR IN THE VILLAGE OF DOLTON ILLINOIS, AND THAT CANDIDATE WAS NONE OTHER THAN TIFFANY A. HENYARD. ME AND TIFFANY A. HENYARD SPOKE A BIT AND I LEARNED THAT SHE WOULD INFACIT NOT ONLY BECOME THE MAYOR IF ELECTED, BUT ALSO WOULD MAKE HISTORY AS THE FIRST AFRICAN AMERICAN (FEMALE) MAYOR OF THAT VILLAGE. I WAS INSPIRED AND EMOTIONALLY MOVED TO MEET SUCH A ACHIEVED YOUNG WOMAN BUT UNBEKNOWNST THAT I HAD BEEN RECRUITED AS A OFFICIAL CAMPAIGN WORKER. THAT VERY SAME NIGHT AND EACH DAY AND NIGHT THEREOF, I CAMPAIGNED RELENTLESSLY, WALKING DOOR TO DOOR AND FEELING THE PRESSURES OF BURNING OUT MY FUEL IN A VEHICLE A HAD NO JOB TO REPLACE THE GAS.

LEADING UP TO THE FINAL MOMENTS OF TIFFANY A. HENYARD'S BIG WIN FOR THE MAYOR OF DOLTON, ILLINOIS AND ON ACCOUNTS DURING DAYS AND EVENING HOURS OF CAMPAIGNING, I WAS REGULARLY ASKED BY TIFFANY A. HENYARD IF I WANTED TO WORK AS HER PERSONAL DETAIL ONCE SHE'D WON THE BIG SEAT AS MAYOR. IT WAS FLATTERING TO BE OFFERED SUCH A HONORARY POSITION GIVEN MY QUESTIONABLE BACKGROUND AND WITHOUT THE USUAL REQUIREMENTS, SO I ASKED HER WAS SHE SERIOUS, TO WHICH SHE REPLIED, "YES I'M SERIOUS". PREVIOUSLY TO TIFFANY A. HENYARD ASKING ME IF I WANTED TO EARN 60 THOUSAND DOLLARS A YEAR FOR WORKING AS HER PERSONAL DETAIL, WE (BEING BOTH TIFFANY AND MYSELF) TALKED ALSO ABOUT GOING INTO A GREETINGS CARD BUSINESS AND WE WERE SCHEDULED TO SIGN A LLC THROUGH HER ATTORNEY. WITH BEING OUR PREVIOUS CONVERSATION LEADING UP TO HER ASKING ME IF I WANTED TO WORK AS HER PERSONAL DETAIL, I RESPECTFULLY DECLINED, POINTING OUT THAT MY CRIMINAL BACKGROUND COULD HARM HER POLITICAL IMAGE AND THAT I WOULD BE SATISFIED WITH JUST EMBARKING ON THE → (2)

GREETINGS CARD VENTURE WITH HER INSTEAD. IN THE MONTHS TO COME AND AFTER SO MUCH PERSONAL SECURITY AND CAMPAIGN WORK COLLECTIVELY, TIFFANY A. HENYARD HAD FINALLY WON THE SEAT FOR MAYOR. I WAS ASKED TO DO SECURITY AND PERSONAL DETAIL WORK FOR HER BIG INAUGURATION AND INTRODUCTION AS THE NEWLY ELECTED MAYOR OF THE VILLAGE OF DOLTON. DAYS LATER SHE CALLED ME AND SAID SHE WAS SORTING THROUGH HER TRANSITION LIST AND SAID SHE HAD A HIGH PAYING JOB FOR ME SINCE WE AGREED THAT MY CRIMINAL BACKGROUND WOULD LIKELY CAUSE A FEW EYE BROWS TO RAISE IN SKEPTICISM. AGAIN, I POINTED OUT TO TIFFANY A. HENYARD (NOW MAYOR HENYARD) THAT I WAS NOT LOOKING TO WORK A JOB, BUT THAT I WAS STILL WAITING ON HER AND I TO LAUNCH OUR GREETINGS CARD VENTURE. MAYOR TIFFANY A. HENYARD RESPONDED BY TELLING ME THAT WE WOULD INFACIT START OUR BUSINESS AS OFFICIAL PARTNERS BUT THAT SHE WAS TOO BUSY, SORTING THROUGH THE ESSENTIALS WITH REGARDS TO HER TRANSITIONAL TEAM AND HER OVERALL ROLL AS MAYOR. WEEKS LATER I WAS CALLED IN TO WORK AS A CODE ENFORCEMENT OFFICER.

IN THE MONTHS FOLLOWING MY ROLE WORKING AS A DOLTON ILLINOIS CODE ENFORCEMENT OFFICER, THERE WAS A LOT OF FIGHTING AND NO TRANSPARENCY BETWEEN BOTH THE MAYOR, TIFFANY HENYARD AND THE VILLAGE OF DOLTON'S BOARD OF TRUSTEES. I WAS UNFAIRLY SINGLED OUT AND ATTACKED CONSTANTLY BY BOTH FOX NEWS AND MAYOR TIFFANY A. HENYARDS MANY UNFAVORABLE CRITICS. I WAS DEMONIZED AND PORTRAYED AS A CHILD SEX OFFENDER WHO WAS UNWORTHY TO WORK OR SHOULD NOT BE GIVEN THE OPPORTUNITY TO WORK AS A CODE ENFORCEMENT OFFICER. THE TRUE EVENTS OF MY BACKGROUND WAS PUBLICIZED WITH A ONE SIDED NARRATIVE WHICH PAINTED THE PICTURE OF A MONSTER WHO HAD BEEN GIVEN A BADGE AND ~~EXCESS~~ EXCLUSIVE ACCESS TO RESIDENTS HOMES, WHEN IN FACT I WAS A YOUNG 15 YEAR OLD TROUBLED KID WHO HAD DECIDED TO HANG AROUND A GROUP OF FELLOW TROUBLE KIDS AND A UNCLE OF THOSE KIDS WHEN THE CRIME ACCURED. I WAS CONVICTED SIMPLY FOR BEING PRESENT AND PLAYED NO ACTIVE ROLL IN THE SEX CRIME ITSELF. I WAS CONVICTED BECAUSE I HAD NO PROPER DEFENSE AND DID NOT UNDERSTAND THE LAW. MAYOR TIFFANY A. HENYARD OPENLY LIED TO BOTH FOX NEWS REPORTERS AS WELL AS THE VILLAGE OF DOLTON'S BOARD OF TRUSTEES. CLAIMING TO NOT HAVE ANY KNOWLEDGE OF

MY CRIMINAL BACKGROUND, WHICH INSTIGATED THE CHICAGO POLICE SEX OFFENDER UNIT TO ARREST ME. I WAS TRIED AND PUT ON TRIAL FOR FAILING TO COMPLY WITH THE STATE'S SEX OFFENDER REGISTRY THEN LATER ACQUITTED OF ALL CHARGES. WITH ALL THE BAD PUBLICITY AND CONSTANT MISCHIEF SURROUNDING MY BACKGROUND, I DECIDED TO STAY AWAY FROM POLITICS. IN MONTHS TO FOLLOW, THE BOARD OF TRUSTEES DECIDED TO RECALL MAYOR TIFFANY A. HENYARD'S SEAT AS MAYOR OF DOLTON ILLINOIS AND SHE CALL ME DIRECTLY AND TEXT ME ASKING IF I COULD COME OUT TO HELP HER, I DECLINED AND SHE GOT UPSET. I WAS APPROACHED IN THE VILLAGE HALL'S PARKING LOT AND YELLED AT BY MAYOR HENYARD CLAIMING I WASN'T LOYAL AND OTHER PROFANITIES I DONT CARE TO MENTION. BOTH POLITICAL INFLUENCES AS WELL AS RESIDENTS AND FELLOW EMPLOYEES USHERED ME TO GO TO THE MEDIA AND TELL MY SIDE OF THE STORY, A STORY THE MAYOR AND HER THEN, CHIEF OF STAFF TRIED TO KEEP ME QUIET ABOUT. I CONTACTED TOM SLOWVIC FROM THE CHICAGO TRIBUNE AND HE READILY GAVE ME AN INTERVIEW. I TOLD HIM THE TRUTH ABOUT HOW MAYOR TIFFANY A HENYARD LIED TO THE MEDIA ABOUT HER LACK OF KNOWLEDGE WITH REGARDS TO MY BACKGROUND AND THAT SHE WOULD —

(5)

LIKELY TRY TO FIRE ME FOR TELLING MY TRUTHS, TO WHICH SHE DID ALMOST IMMEDIATELY AFTER BEING SOUGHT OUT BY THE CHICAGO TRIBUNE. I GAVE MY INTERVIEW ON 8/31/2022 AND THAT WEDNESDAY, DURING MY LUNCH BREAK, I WAS CALLED IT THE VILLAGE OF DOLTON'S VILLAGE HALL, AND HANDED TWO COPIES OF A TERMINATION PAPER WITH NO SIGNATURES ON EITHER. BECAUSE I SPOKE OUT TO TOM SLOWVIC FROM THE CHICAGO TRIBUNE TO CLEAR MY NAME FROM PUBLIC RIDICULE AND THE SUBJECTION OF THREATS AND DISMISSIVE LANGUAGE, I WAS TARGETED, HUMILIATED AND FIRED FROM MY JOB, FOLLOWING HOMELESSNESS, DEPRESSION AND ~~NO INCOME. I WAS~~ SUFFERING. I WAS DEPRIVED OF MY FIRST AMENDMENT RIGHT TO FREEDOM OF SPEECH ~~AND~~ A RIGHT WHICH INCLUDES ALL AMERICANS, INCLUDING FORMERLY INCARCERATED.

Lavell Redmond

PLAINTIFF(S),

VS.

TIFFANY A. HENYARD (IN HER OFFICIAL CAPACITY)
AS MAYOR

VILLAGE OF DOLTON

DEFENDANT(S).

(ANSWER TO ITEM 12)

PLAINTIFF WAS TERMINATED FROM EMPLOYMENT BY THE DEFENDANT AND AS A RESULT, PLAINTIFF LOST HIS INCOME. THIS RESULTED IN THE PLAINTIFF BECOMING HOMELESS. PLAINTIFF IS EMBARRASSED AND HUMILIATED. THIS HAS RESULTED IN THE PLAINTIFF'S EMOTIONAL DISTRESS PAIN AND SUFFERING AND LOSS OF ENJOYMENT OF LIFE.

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

14. Plaintiff also claims violation of rights that may be protected by the laws of Illinois, such as false arrest, assault, battery, false imprisonment, malicious prosecution, conspiracy, and/or any other claim that may be supported by the allegations of this complaint.

WHEREFORE, plaintiff asks for the following relief:

- A. Damages to compensate for all bodily harm, emotional harm, pain and suffering, loss of income, loss of enjoyment of life, property damage and any other injuries inflicted by defendant;
- B. ☒ (Place X in box if you are seeking punitive damages.) Punitive damages against the individual defendant; and
- C. Such injunctive, declaratory, or other relief as may be appropriate, including

attorney's fees and reasonable expenses as authorized by 42 U.S.C. § 1988.

Plaintiff's signature: _____

Plaintiff's name (print clearly or type):

Plaintiff's mailing address:

City

State

ZIP

Plaintiff's telephone number: (708)

Plaintiff's email address (if you prefer to be contacted by email):

15. Plaintiff has previously filed a case in this district. ☐ Yes ☒ No

If yes, please list the cases below.

Any additional plaintiffs must sign the complaint and provide the same information as the first plaintiff. An additional signature page may be added.